

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

UNITED STATES OF AMERICA,

CR 19-30036-02

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

SARAH WORTHMAN,

Defendant.

The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

Beginning at a time unknown but no later than on or about February 21, 2019, and continuing to on or about March 5, 2019, in the District of South Dakota and elsewhere, the Defendant, knowingly and intentionally, combined, conspired, confederated, and agreed with persons to knowingly and intentionally distribute and possess with intent to distribute 50 kilograms or more of marihuana, a Schedule I controlled substance, in violation of 21 U.S.C. §§ 846, 841(a)(1), and 841(b)(1)(C).

On February 21, 2019, the Defendant was driving a U-Haul truck containing approximately 150 pounds, between 60 and 80 kilograms, of marihuana. Brendan Lee was the only passenger. The U-Haul was stopped for a speeding violation by tribal law enforcement on the Cheyenne River Sioux

Indian Reservation in South Dakota and was eventually searched. The marihuana was hidden in couches stored in the U-Haul. The Defendant knew the U-Haul contained marihuana.

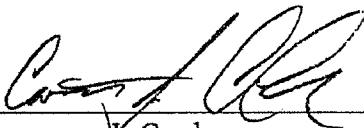
Lee purchased the marihuana in California, which was loaded into the U-Haul truck by others. Lee paid the Defendant to drive the U-Haul from California to Chicago, Illinois. The Defendant and Lee flew to Boise, Idaho, rented the U-Haul, and then drove to California to pick up the marihuana. Lee intended to distribute the marihuana in the Chicago area. The Defendant knowingly and intentionally conspired with Lee to distribute the marihuana in the U-Haul.

Marihuana is a Schedule I controlled substance.

RONALD A. PARSONS, JR.
United States Attorney

8.6.2019

Date


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8/7/19
Date

8/8/19
Date

Sarah Worthman
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Defendant

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